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March 11, 1999

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, D.C. 20554

Ex Parte Presentation

Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911
Emergency Calling Systems
CC Docket No. 94-102, RM-8143

Dear Ms. Salas:

On March 11, 1999, Douglas Brandon, Karl Korsmo, and Lori Buerger of AT&T Wireless Services ("AT&T") and the undersigned met with Thomas Sugrue, James Schlichting, John Cimko, and Nancy Boocker of the Wireless Telecommunications Bureau to discuss the above-referenced matter. The points we raised are reflected in the attached memorandum.

Pursuant to sections 1.1206(b)(1) and (b)(2) of the Commission's rules, an original and one copy of this letter and attachment are being filed with the Office of the Secretary. Copies of the letter and the attachment are also being served on the Commission personnel that attended the meeting.

Sincerely,

Michelle M. Mundt

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cc: Thomas Sugrue
James Schlichting
John Cimko
Nancy Boocker

AT&T Wireless Services, Inc. (AWS)
E9-1-1 Phase I: Status Update 3/11/99
CC Docket No. 94-102; RM 8143

Key Points

- AWS continues to be actively engaged in meeting the spirit of the FCC order, investing heavily in meeting requirements and working cooperatively with the public safety community. AWS' recent price reduction for the NCAS Phase I solution demonstrates its commitment to rapid, national Phase I deployment.
- As evidenced by the successful multi-carrier, multi-technology Phase I Trial in California and AWS' unsuccessful trial experience in Minnesota, successful Phase I implementations which guarantee quality service to wireless customers and efficient, appropriate use of surcharge revenues will occur only if control over technical choice ultimately belongs to wireless carriers.

Update of AWS' Successful Phase I Implementation Efforts

- Oregon (80% of customers statewide by 2/28/99; 96% projected for end of 1999)
- Colorado (21% of customers statewide as of 2/4/99; 74% projected for end of 1999)
- Clark County, WA (Note: Field demonstration designed to stimulate Phase I requests)
- Los Angeles, CA (Note: State-directed Phase I trial of multiple technologies)
- Percentage of AWS national customer base receiving Phase I (excluding trials and demonstrations) is 4.59%

Planned Phase I Implementations for 1999

As of 2/99, approximately 28 states are collecting 911 surcharges from wireless customers. (In addition, some individual municipalities and counties, such as Chicago and Washoe County, NV, are collecting surcharges although no statewide surcharges has been implemented.) Despite collecting surcharges, however, PSAPs in the majority of these states have not requested Phase I. At present, AWS is working towards Phase I deployments with isolated PSAPs in:

- Georgia (4 PSAPs have requested service)
- South Carolina (1 PSAP requested service)
- North Carolina (2 PSAPs requested service)
- Illinois (1 PSAP requested service)
- Texas (1 PSAP requested service)

AWS Price Reduction for NCAS Phase I Solution

- During 11/98, after analyzing costs incurred during multiple Phase I implementations, AWS reduced its national Phase price from \$.25 to \$.196 per customer per month. (This is a monthly recurring price; no non-recurring price applies.)
- In addition to matching actual implementation costs, the new price reflects AWS' decision to voluntarily forego cost recovery on approximately \$6 million in expenses incurred during the company's preparatory effort to widely deploy Phase I service on the FCC's 4/1/98 deadline.
- Unfortunately, lack of PSAP requests rendered AWS' 4/1/98 readiness largely premature. AWS recognized that continued efforts to recover those early costs could prove to be an obstacle to Phase I deployment.

Unsuccessful Phase I Implementation

- During 1998, in an effort to work cooperatively with the PSAP community, AWS agreed to partner with the State of Minnesota on a Phase I trial utilizing the State's preferred technology (Feature Group D-based). AWS was the only carrier to cooperate and did so at no cost to the state; AWS paid all implementation and vendor costs associated with its participation in the Trial and received no reimbursement of costs.
- Minnesota's preferred technology resulted in seriously degraded call set-up times for AWS customers dialing 9-1-1. Prior to the trial ("Phase O" non-enhanced 911 service), customers dialing 9-1-1 experienced call set-up time (measured from customer pressing the "send" button to first answerable ring at the PSAP) of 6 seconds. During the trial, utilizing the State's technical solution, call set-up performance was increased to 14 seconds.
- At the conclusion of the Trial period, due to the degradation of call set-up time, AWS declined further participation and reverted to Phase O.
- AWS continues to talk with Minnesota about re-initiating Phase I service, but will do so only with technology which does not negatively impact service to customers.

ILEC ALI Interconnection Issue Status

- In response to lengthy efforts by AWS, SBC has informed AWS it is ready to provide ALI "steering" services necessary to provide NCAS Phase I solution in Texas. Unfortunately, despite collecting \$.50 per month from wireless customers, no Texas PSAP has agreed to request implementation of NCAS service.
- AWS formally requested ALI steering services from Bell Atlantic 11/17/98; discussions are underway currently to try to achieve this goal.

Los Angeles Phase I E9-1-1 Trial

- AWS, through its partnership market Los Angeles Cellular Telephone Company (LACTC), participated with the State of California's Phase I Trial in Los Angeles County.
- The LA Trial was extremely well-managed by the California Department of General Services, which clearly acknowledged wireless carriers' right to select Phase I technologies, as long as those technologies were fully standards-compliant and met all FCC requirements.
- The successful Trial demonstrated the complete lack of interoperability problems often feared by PSAP community. Trial results showed complete compatibility, despite use of multiple Phase I technical solutions (both Non-Callpath Associated [NCAS] and Callpath Associated [CAS] solutions), multiple ALI database providers (GTE and Pacific Bell), and multiple 911 service providers/vendors (XYPoint and SCC).

Phase II E9-1-1 Status

- AWS does not favor delay of Phase II E9-1-1. Rather, we are engaged in the difficult process of sorting through the various potential Phase II technologies (both network- and handset-based).
- Current status of technology seems to indicate that allowing flexibility in Phase II implementation may allow deployment of better Phase II service to more customers sooner, versus an inflexible approach which could result in higher costs, low PSAP acceptance (not unlike Phase I) and overall delay of improved 9-1-1 service to wireless customers.